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September 1, 2022

**VIA ECF**

Hon. Vernon S. Broderick  
United States District Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**APPLICATION GRANTED**

**SO ORDERED**

**VERNON S. BRODERICK**

**U.S.D.J.** 09/06/2022

**Re: Moonbug Entertainment Limited, et al., v. BabyTee Store, et al.  
Civil Case No. 22-cv-2032 (VSB)  
Request for Extension of Time to File Supplemental Submission**

Dear Judge Broderick,

We represent Plaintiffs Moonbug Entertainment Limited and El Bebe Productions Limited (“Plaintiffs”), in the above-referenced matter (the “Action”).<sup>1</sup> On August 25, 2022, the Court directed Plaintiffs to file a supplemental declaration by no later than September 7, 2022 (“Supplemental Declaration”). For the reasons set forth herein, Plaintiffs respectfully request a two-week extension to file the Supplemental Declaration, until September 21, 2022.

In accordance with Your Honor’s Individual Practices, Plaintiffs respectfully submit the following:

1. **Original date:** September 7, 2022;
2. **Number of previous requests for extension of time:** None, this is Plaintiffs’ first request for an extension of time to file their Supplemental Declaration;
3. **Whether these previous requests were granted or denied:** N/A;
4. **Whether the adversary consents:** None of the Defendants have appeared in this Action and thus Plaintiffs did not seek their consent; and
5. **The specific reasons for an extension of time:** The reason for Plaintiffs’ request for an extension of time is that Epstein Drangel needs additional time to correspond with its Beijing office regarding its investigation of Defendants’ addresses and potential means to determine whether Defendants’ addresses are accurate.

We thank the Court for its time and attention to this matter.

<sup>1</sup> Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary in Plaintiffs’ Complaint or Application.

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Respectfully submitted,

**EPSTEIN DRANGEL LLP**

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